1			
1	STEVEN C. HOLTZMAN (CA BAR NO. 144177) sholtzman@bsfllp.com		
2	BOIES SCHILLER & FLEXNER LLP 1999 Harrison Street, Suite 900		
3	Oakland, CA 94612 Telephone: (510) 874-1000		
4	Facsimile: (510) 874-1460		
5	D. MICHAEL UNDERHILL (pro hac vice) munderhill@bsfllp.com		
6	BOIES SCHILLER & FLEXNER LLP 5301 Wisconsin Avenue NW		
7	Washington, D.C. 20015 Telephone: (202) 237-2727		
8	Facsimile: (202) 237-6131		
9	Attorneys for Defendant CONNECTU, INC.		
10			
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN JOSE DIVISION		
13	THE FACEBOOK, INC. and MARK	CASE NO. 5:07-CV-01389-JW	
14	ZUCKERBERG, Plaintiffs,	CONNECTU'S ADMINISTRATIVE MOTION TO SEAL:	
15	V.	(1) CONNECTU, INC.'S OPPOSITION	
16	CONNECTU, INC. (formerly known as	TÓ MOTION TÓ QUASH; (2) SECOND DECLARATION OF	
17	CONNECTU, LLC), PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS,	ÈVAN A. PARKE IN SUPPORT THEREOF;	
18	and WAYNE CHANG,	(3) SUPPLÉMENTAL DECLARATION OF ROBERT T.	
19 20	Defendants.	CLARKSON IN SUPPORT THEREOF;	
21		(4) DECLARATION OF ROBERT T. CLARKSON IN SUPPORT	
22	•	THEREOF; (5) DECLARATION OF CAMERON	
23		<b>WINKLEVOSS IN SUPPORT</b>	
24		THEREOF; (6) CORRECTED DECLARATION	
25	·	OF DONNA HITSCHERICH IN SUPPORT THEREOF; AND	
26	·	(7) [PROPOSED] ORDÉR DENYING THE MOTION TO QUASH AND FOR A PROTECTIVE ORDER FILED BY	
27		FENWICK & WEST LLP AND	
20		GREGORY ROUSSEL	

Pursuant to Civil L.R. 7-11 and 79-5(d), ConnectU respectfully submits this administrative motion asking the Court to file under seal (1) ConnectU, Inc.'s Opposition To Motion To Quash; (2) Second Declaration Of Evan A. Parke In Support Thereof; (3) Supplemental Declaration Of Robert T. Clarkson In Support Thereof; (4) Declaration Of Robert T. Clarkson In Support Thereof; (5) Declaration Of Cameron Winklevoss In Support Thereof; (6) Corrected Declaration Of Donna Hitscherich In Support Thereof; And (7) [Proposed] Order Denying The Motion To Quash And For A Protective Order Filed By Fenwick & West LLP And Gregory Roussel.

The parties entered into, and the Superior Court of California, Superior County issued, a Stipulated Protective Order on January 23, 2006, prohibiting either party from filing in the public record any documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the protective order.

ConnectU, Inc.'s Opposition To Motion To Quash and documents filed in support thereof contain information that Facebook has asserted is covered by the Protective Order and/or are alleged by Plaintiffs to implicate confidentiality provisions found in a purported agreement which is the subject of dispute between the parties.

ConnectU requests that its Opposition To Motion To Quash and documents filed in support thereof remain sealed.

By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility or inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-confidentiality of information relating to the purported agreement, or (iii) the enforceability or unenforceability of the purported agreement.

1	Dated: June 2, 2008	
2		/s/ Steven C. Holtzman Steven C. Holtzman
4		STEVEN C. HOLTZMAN (CA BAR NO. 144177) BOIES SCHILLER & FLEXNER LLP
5		1999 Harrison Street, Suite 900 Oakland, CA 94612
6 7		Telephone: (510) 874-1000 Facsimile: (510) 874-1460 Email: sholtzman@bsfllp.com
8		D. MICHAEL UNDERHILL (pro hac vice)
9		munderhill@bsfllp.com BOIES SCHILLER & FLEXNER LLP 5301 Wisconsin Avenue NW
10		Washington, D.C. 20015 Telephone: (202) 237-2727
11		Facsimile: (202) 237-6131
12		Attorneys for Defendant CONNECTU, INC.
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		

28

## **CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 2, 2008.

Dated: June 2, 2008

- '

/s/ Steven C. Holtzman

Steven C. Holtzman